

EXHIBIT 15

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Co-Lead Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE TEZOS SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

CLASS ACTION

DECLARATION OF ANDREW BAKER

Date: August 27, 2020
Time: 1:30 p.m.
Courtroom: 3, 17th floor
Judge: Hon. Richard Seeborg

1 I, Andrew Baker, declare as follows:

2 1. I am the plaintiff in the securities class action pending in the Superior Court of
3 California in the County of San Francisco, and captioned *Baker v. Dynamic Ledger Solutions,*
4 *Inc. et al.*, Case No. CGC-17562144 (the “State Litigation”).¹

5 2. I am aware of and understand the requirements and responsibilities of a
6 representative plaintiff in a securities class action, including those set forth in the Private
7 Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. §§78u-4; 77z-1. I have
8 personal knowledge of the matters set forth in this declaration, as I have been directly involved
9 in monitoring and overseeing the prosecution of the State Litigation, as well as the negotiations
10 leading to the Settlement, and I could and would testify competently to these matters.

11 **I. MY OVERSIGHT OF THE LITIGATION**

12 3. The initial complaint in the State Litigation was filed at my direction on October
13 25, 2017.

14 4. In fulfillment of my responsibilities on behalf of all class members in the State
15 Litigation, I have worked closely with Taylor-Copeland Law and Robbins Geller Rudman &
16 Dowd LLP (collectively, “State Lead Counsel”) regarding all aspects of the litigation and
17 resolution of the State Litigation.

18 5. Throughout the litigation, I received periodic status reports from State Lead
19 Counsel on case developments and participated in regular discussions concerning the prosecution
20 of the Action, the strengths and risks to the claims, and potential settlement. In particular,
21 throughout the course of this Action, I: (a) reviewed relevant documents; (b) stayed apprised of
22 developments of the case and made myself available to State Lead Counsel; (c) provided State
23 Lead Counsel with extensive information and materials regarding my investments; (d) conferred
24 with State Lead Counsel throughout the litigation; (e) provided documents and responses to
25 interrogatories and requests for admission during the discovery process; (f) reviewed complaints
26 and other pleadings; (g) consulted with my attorneys regarding settlement negotiations; and (h)

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28 ¹ Unless otherwise indicated, capitalized terms shall have the meaning ascribed to them in the Stipulation and in Lead Plaintiff’s Notice of Motion, Motion for Preliminary Approval of Settlement, and Memorandum of Points and Authorities in Support Thereof. ECF No. 246.

1 evaluated and approved the proposed Settlement.

2 **II. APPROVAL OF THE SETTLEMENT**

3 6. Through my active participation, I was kept informed of the progress of the
4 settlement negotiations in this litigation. Both before and after the mediation process presided
5 over by the Hon. Layn Phillips, I conferred with my attorneys' regarding the parties' respective
6 positions.

7 7. Based on my involvement throughout the prosecution and resolution of the claims
8 asserted in the Action and the advice of my counsel, I believe that the Settlement provides an
9 excellent recovery for the Settlement Class, particularly in light of the risks of continued
10 litigation. Thus, I believe that the proposed Settlement is fair, reasonable, and adequate to the
11 Settlement Class and I strongly endorse approval of the Settlement by the Court.

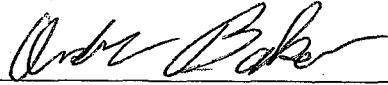
12 8. I believe that the request for an award of attorneys' fees in the amount of one-
13 third of the Settlement Fund is fair and reasonable in light of the work performed by counsel on
14 behalf of the Settlement Class. I have evaluated this fee request by considering the work
15 performed, the recovery obtained for the Settlement Class, and the risks of the Action, and have
16 authorized this fee request for the Court's ultimate determination.

17 9. I further believe that the litigation expenses being requested for reimbursement to
18 counsel are reasonable, and represent costs and expenses necessary for the prosecution and
19 resolution of the claims in the Action. Based on the foregoing, and consistent with my obligation
20 to the Settlement Class to obtain the best result at the most efficient cost, I fully support the
21 motion for an award of attorneys' fees and reimbursement of litigation expenses.

22 10. I devoted significant time to the representation of the Settlement Class in this
23 Action, which was time that I otherwise would have spent at my job or engaged on other
24 activities and, thus, represented a cost to me. I devoted at least 40 hours in the litigation-related
25 activities described above.
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1 I declare under penalty of perjury of the laws of the United States of America that the
2 foregoing is true and correct to the best of my knowledge.

3 Executed on July 27, 2020, at San Diego, California.

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6 Andrew Baker
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